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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ARPITA CAMPO,

Plaintiff

v.

ROBERT HALF INTERNATIONAL, a  
foreign corporation; DOES 1-10, inclusive;  
ROE CORPORATIONS 1-10 inclusive.

Defendants.

Case No.: 2:12-cv-01353

**STIPULATED PROTECTIVE ORDER  
REGARDING ROBERT HALF  
INTERNATIONAL INC. BUSINESS  
RECORDS**

IT IS HEREBY STIPULATED AND AGREED by Plaintiff Arpita Campo, by and through her counsel of record, Kirk Kennedy, Esq., and by Defendant Robert Half International Inc. ("RHI"), by and through its counsel of record, Gregory Smith, Esq. and Amy Baker, Esq., of Lionel Sawyer & Collins, that a Protective Order be entered on the following terms:

1. The business records produced by RHI may contain confidential information and, if so, either party may so designate as confidential and such designated documents shall be treated as confidential by the parties. Such confidential documents and information shall be used solely for the prosecution or defense of this litigation. RHI may designate certain of its business records as confidential and subject to the terms of this Protective Order by placing an appropriate

1 stamp on the face of the document, indicating that such document has been designated  
2 confidential and subject to the terms of this Protective Order. The party designating a document  
3 as confidential shall bear the burden of proof as required by law that such document is entitled to  
4 protection.

5 2. "Confidential information," as used herein, means information of any type, kind  
6 or character which is designated as "confidential" or "proprietary" by any of the supplying or  
7 receiving parties, whether it be a document, information contained in a document, information  
8 revealed during a deposition, information revealed in any discovery process including but not  
9 limited to, depositions or answers to interrogatories. In designating information as "confidential"  
10 or "proprietary," a party will make such designation only as to that information that it in good  
11 faith believes contains confidential information.

12 3. Such confidential documents and information may be disclosed only to the  
13 following persons: (a) parties to this stipulation; (b) counsel for the parties to this stipulation and  
14 persons regularly employed in the offices of such counsel; (c) outside experts or professional  
15 advisors retained by a party to assist in the prosecution or defense in the case and persons  
16 regularly employed in the offices of such outside experts and professional advisors; (d) court  
17 personnel, deponents and court reporters/videographers; provided, however, that prior to such  
18 disclosure to the persons described in clause (c) above, counsel shall furnish a copy of this  
19 Protective Order to such person and obtain the written agreement of such person to be bound by  
20 the terms of this Protective Order. The requirement of obtaining such a written agreement may  
21 be satisfied by obtaining the signature of any such person at the foot of a copy of this Order.

22 4. The sealing or redacting of any Court Records, which are subject to this  
23 Protective Order will be governed by United States District Court District of Nevada Rules LR  
24 9018, and LR 10-5. All parties acknowledge that, if the parties do not agree, the party taking the  
25 position that it is confidential, has the burden of proving confidentiality to this Court and agree  
26 that this agreement alone does not constitute a sufficient basis for the Court to seal or redact  
27 Court Records.

1           5.       Nothing contained in this Protective Order shall preclude RHI from using the  
2       respective confidential documents or information in any manner it sees fit, or from providing  
3       such confidential documents or information to whomever it chooses, without the prior consent of  
4       any other party or of this Court.

5           DATED this 29th day of October, 2012.

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7           KIRK KENNEDY, ESQ.

LIONEL SAWYER & COLLINS

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9       By:    /s/: Kirk T. Kennedy  
10       Kirk T. Kennedy, Esq.  
11       Nevada Bar No. 5032  
12       (702) 385-5534  
13       Attorney for Plaintiff

By:    /s/: Gregory E. Smith  
Gregory E. Smith, Esq.  
Nevada Bar No. 1590  
Amy L. Baker  
Nevada Bar No. 11907  
Attorneys for Defendant

14                   IT IS SO ORDERED:

15                     
16                   UNITED STATES DISTRICT JUDGE

17                   Dated:    October 30, 2012  
18                   \_\_\_\_\_